

**Submission
No 173**

**INQUIRY INTO IMPACT OF THE WESTERN HARBOUR
TUNNEL AND BEACHES LINK**

Name: Mr Jamie Parker MP

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www.jamieparker.org.au
112a Glebe Point Road Glebe NSW 2037
9660 7586
jamie.parker@parliament.nsw.gov.au

JAMIE PARKER MP
Member for Balmain



The Hon. Daniel Mookhey MLC
Chair Public Works Committee
NSW Legislative Council
Parliament House
Macquarie Street
SYDNEY NSW 2000

By email: Public.Works@parliament.nsw.gov.au

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Submission to the inquiry on Impact of the Western Harbour Tunnel and Beaches Link

I welcome the opportunity to make a submission to the NSW Parliamentary Inquiry into the proposed Western Harbour Tunnel (WHT) and Beaches Link.

I have previously expressed my strong objection in my submission to the Environmental Impact Statement as well as in NSW Parliament.

Given the proposed works for the Western Harbour Tunnel will begin in my electorate of Balmain which covers Lilyfield, Rozelle, Balmain, Balmain East and Birchgrove, I am deeply concerned about the adverse impacts of the construction and operation of this project on my community.

Furthermore, global experience of toll road construction has demonstrated conclusively that projects like this increase air pollution, encourage more car use, fleece road users with exorbitant tolls and eventually fill the increased road capacity they create.

(a) the adequacy of the business case for the project, including the cost benefits ratio

The project's business case is poor and has not been dealt with transparently and there is a lack of strategic justification.

Instead of motorways, our community supports approaches that have been demonstrated to work to reduce traffic congestion including: public transport, active transport, travel demand management and transit-oriented local development.

The costs to our community and our environment have not been considered adequately and the benefits are limited

(b) the adequacy of the consideration of alternative options

The NSW government has instructed transport officials to ignore public transport alternatives to motorway projects which impacts the business case for projects like the Western Harbour Tunnel.

A memo published in the *Sydney Morning Herald* on April 10 2017 in an article titled 'F6 planners told to ignore public transport, build roads, documents show', states that:

"In the case of the F6 extension, a diverse range of design and location options were considered, but only in the context of a tolled and untolled road-based solution. The existence of a cabinet direction not to consider other options must not preclude the consideration of public transport".

Public transport projects can provide a genuine, long term solution to road congestion without significantly increasing greenhouse gas emissions. Failing to benchmark this project against public transport alternatives significantly impacts the justification for this project.

(j) the impact on the environment, including marine ecosystems

- **No consideration of induced demand**
Global experience of toll roads indicate that they induce demand, create more traffic in the long term and push people into their cars. The EIS makes no consideration of induced demand and the consequential impact on emissions and climate change.
- **Ignores lack of fuel standards in Australia**
The Environmental Impact Statement makes ridiculous claims that climate change impacts of this project will reduce over time as fuel efficiency standards are increased. However, Australia's transport-related emissions have continued to rise and there is no commitment by government to implement any efficiency or fuel quality standards for vehicles. In fact Australia remains the only country in the OECD without a fuel efficiency standard for passenger vehicles and has one of the worst fuel quality standards in the 36 nation OECD.
- **Dredging of toxic sediment will pollute the harbour**
142,500 cubic metres of contaminated sediment will be dredged from the harbour floor and processed at White Bay. This sediment was stated in the EIS to be contaminated with dioxins, tributyl tin and heavy metals as a result of the harbour's industrial past. Dredging threatens to contaminate harbour waters by creating a toxic plume that will be difficult to contain. While some minimisation measures are proposed like shallow floating silt curtains, these measures may not be sufficient to prevent plumes of contaminated sediments escaping to the harbour.
- **Pollution puts marine species at risk**
Australian Museum records since 1850 indicate that Sydney Harbour is biologically diverse, with over 2473 species of polychaetes, crustaceans, molluscs and echinoderms recorded. The EIS proposes to dredge toxic sediment from the harbour floor creating toxic plumes of pollution which will threaten Sydney Harbour's marine life. 70 threatened species are at risk including fragile sea grasses that support 20 species of endangered seahorses and dragons.
- **Road-header options have not been given adequate consideration**
The EIS states that road-header options (which would remove the need for dredging) were discounted for the harbour crossing because the tunnel depth required by this

method would significantly compromise gradients and force drivers to descend and climb into the tunnel. Here the EIS is placing driver amenity and comfort ahead of environmental protection without even weighing the costs and benefits.

- **Critical details about the sediment have been omitted**

While the EIS lists the massive volumes of sediment that will be dredged it doesn't list details about the concentration of dioxins, tributyl tin, polynuclear aromatic hydrocarbons and heavy metals which is a critical factor in determining the impact on marine life and biodiversity. These details must be released to provide any meaningful feedback on the proposal.

- **There is no safe level of particulate matter**

Research demonstrates that there is no safe exposure level to particulate matter generated by traffic. The EIS fails to fully evaluate the long-term health impacts of the Project. It especially neglects the increased susceptibility of children, the elderly and people with chronic disease who are particularly at risk of the health effects of traffic related particulate matter.

- **No filtration of exhaust stacks**

With two-thirds of people in NSW living in metropolitan Sydney relatively close to major roads, vehicles are one of the most important sources of particulate matter (PM) exposure in NSW and are a significant contributor to negative health impacts including increased mortality, respiratory and cardio-vascular disease, and adverse birth outcomes. The EIS proposes to install a double exhaust stack at Cammeray and vent pollution to the exhaust stacks already planned for Rozelle Goods Yard. These stacks should be filtered according to the world's best practice to reduce the impact on air quality and human health.

(I) the impact of the project on nearby public sites, including Yurulbin Point and Dawn Fraser Baths

At **Yurulbin Point** there will be significant noise, vibration, health and other impacts on residents for many years in addition to:

- the potential for damage to houses and other buildings from shallow tunnelling
- impacts on trees and other valued features of Yurulbin Park and denial of public access to this park during the construction period
- negative impacts on the community from the relocation of the Birchgrove Ferry Wharf
- construction workers taking on-street parking
- poor visual amenity and impact on harbour views

At the **former Balmain Leagues Club** site there will be impacts on residents for many years including:

- excessive construction noise
- ineffective dust mitigation causing lower air quality
- increased truck movements
- construction workers taking on-street parking and truck stack parking

Residents living nearby the **White Bay** construction and sediment treatment site will experience:

- possible health risks from exposure to the dredged sediments which contain the toxic contaminants including dioxins, tributyl tin, polynuclear aromatic hydrocarbons, and heavy metals.

- unacceptable odour impacts which will occur during the transport and processing of toxic dredged materials
- excessive noise and vibrations
- increased truck movements
- **construction workers taking on-street parking and truck stack parking**

As mentioned above dredging of toxic sediment will pollute the harbour which could also seriously impact the safety of **Dawn Fraser Baths**.

This project is a missed opportunity to transform our city's transport system to make getting around Sydney cheap, easy and fast without having to get into a car and pay a toll.

Yours sincerely,

Jamie Parker MP

Member for Balmain, NSW Parliament

112a Glebe Point Road, Glebe NSW 2037